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Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

§
§ Chapter 11

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

§
§ Case No. 19-34054-sgj11

Reorganized Debtor.

§
§

UBS SECURITIES LLC AND UBS AG LONDON
BRANCH,

§
§

Plaintiffs,

§
§ Adv. Proc. No. 21-03020-sgj

vs.

§
§

HIGHLAND CAPITAL MANAGEMENT, L.P.,

§
§

Defendant.

§
§

**REORGANIZED DEBTOR'S WITNESS AND EXHIBIT LIST WITH
RESPECT TO EVIDENTIARY HEARING TO BE HELD ON AUGUST 8, 2022**

¹ The Reorganized Debtor's last four digits of its taxpayer identification number are (8357). The headquarters and service address for the above-captioned Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

WITNESS AND EXHIBIT LIST FOR HEARING ON AUGUST 8, 2022

DOCS_NY:46239.1 36027/003

Highland Capital Management, L.P. (the “Reorganized Debtor”) submits the following witness and exhibit list with respect to *Highland Capital Management, L.P.’s Motion to Withdraw Its Answer and Consent to Judgment for Permanent Injunctive Relief* [Docket No. 169] (the “Motion”), which the Court has set for evidentiary hearing at 9:30 a.m. (Central Time) on August 8, 2022 (the “Hearing”) in the above-styled adversary proceeding (the “Adversary Proceeding”).

A. Witnesses:

1. James Seery, Jr.;
2. Any witness designated or called by any other party; and
3. Any witness necessary for impeachment or rebuttal.

B. Exhibits:

Ex. No.	Exhibit	Offered	Admitted
1	Legal Liability Insurance Policy between Sentinel Reinsurance, Ltd., Highland CDO Opportunity Master Fund, L.P., Highland CDO Holding Company, and Highland Special Opportunities Holdings Company, effective August 1, 2017		
2	Purchase Agreement between Sentinel Reinsurance, Ltd., Highland CDO Opportunity Master Fund, L.P., Highland CDO Holding Company, and Highland Special Opportunities Holdings Company, dated Aug. 7, 2017		
3	Copy of the Legal Liability Insurance Policy with Endorsements Nos. 1 & 2		
4	Asset Transfer Agreement, dated as of December 31, 2019		
5	Emails between Isaac Leventon, James P. Seery, Jr., and Scott Ellington on August 5, 2020, with subject “UBS Supplemental Information Request”		
6	Email from Scott Ellington to James P. Seery, Jr., and others on August 15, 2020, with subject “UB Diligence Requests: Highland Credit Opportunities CDO Ltd.”		

Ex. No.	Exhibit	Offered	Admitted
7	Email from Matthew DiOrio on January 28, 2021, with subject "HCM - Greenbriar Pref Shares CDO Fund"		
8	Email from Gregory Demo to Thomas Surgent on January 28, 2021, with subject "Highland – MSCF Subscription Documents"		
9	Indemnity Letter, dated June 18, 2020, by and between Sentinel Reinsurance Ltd., and the parties on Schedule 1 thereto		
10	Text Message, dated January 28, 2021, from Matthew DiOrio to Thomas Surgent [REDACTED]		
11	All exhibits identified by or offered by any other party at the Hearing		
12	All exhibits necessary for impeachment and/or rebuttal purposes		
13	Any pleadings, reports, or other documents entered or filed in the Reorganized Debtor's chapter 11 case or related adversary proceedings, including any exhibits thereto		

Dated: August 4, 2022.

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-and-

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